

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company

D.T.E. 01-108

JOINT MOTION TO
EXTEND THE SUSPENSION PERIOD
FOR THE PROPOSED RATE WR, M.D.T.E. NO. 974

Now comes the Massachusetts Water Resources Authority ("MWRA") and Boston Edison Company ("Edison")(collectively "the Moving Parties"), to move that the Department of Telecommunications and Energy ("Department") extend by one month (from April 1, 2002 until May 1, 2002), the suspension period in the above captioned proceeding. The Moving Parties, along with the Office of the Attorney General, have reached a tentative agreement in principle that may result in a consensual resolution of the issues pending in this proceeding. The Moving Parties request an extension of the three month suspension period ordered by the Department on December 27, 2001 in order to finalize this tentative agreement in principle and to reduce that agreement to detailed written terms. The terms of this agreement would resolve the issues pending in this proceeding (as well as other matters relating to the provision of electric service to the MWRA's Deer Island wastewater treatment facility) on a basis that is consistent with the Department's past decisions concerning Rate WR, the requirements of the relevant provisions of Chapter 164 of the General Laws, and the public interest. Pending the final resolution of this matter, the Standstill Agreement between MWRA and Edison would continue to apply to the

same extent as during the initial suspension period. The Moving Parties expect that a final written agreement will be submitted to the Department for its approval no later than the close of business on Thursday, April 11. In these circumstances, the Moving Parties submit that the public interest would be served by a limited extension of the suspension period in this proceeding.

Respectfully submitted,

Massachusetts Water Resources
Authority

By its attorneys,

George B. Dean
Foley, Hoag & Eliot, LLP
One Post Office Square
Boston, MA 02109
617-832-1219

Trudy P. Reilly
Associate General Counsel
Massachusetts Water Resources
Authority
Charlestown Navy Yard
100 First Street
Charlestown, MA 02129
617-242-6000

Boston Edison Company

By its attorney,

William S. Stowe
Assistant General Counsel
800 Boylston Street
Boston, MA 02199
617-424-2544

Assented to,

Office of the Attorney
General

By its attorney,

Alexander J. Cochis
Assistant Attorney General
Utilities Division
Office of the Attorney
General
200 Portland Street
Boston, MA 02114